## Case 3:18-cr-01768-KC Document 3 Filed 05/29/18 Page 1 of 2

## IN THE UNITED STATES DISTRICT COURT FOR THE Western District Of Texas

El Paso Division 05/29/2018

CLERK OF DISTRICT COURT
WESTERN DISTRICT OF TEXAS

FILED

V.	)	NO.	EP:18-M -03824-001
United States of America	)		WESTERN DISTRICT OF ' BY DEPUTY

Juan Carlos ORELLANA-Claros aka

## GOVERNMENT'S MOTION TO DETAIN DEFENDANT WITHOUT BOND AND MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now the United States of America, by and through the United States

Attorney for the Western District Of Texas, and files this, its Motion to

Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

I.

The Government at this time moves the Court to hold the above-named

Defendant without bond pursuant to 18 U.S.C. § 3142(e) and (f). This request

is made for the following reasons:

 The Defendant is a foreign national, and, as such, presents a high risk of fleeing to avoid prosecution on this charge. 2. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

JOHN F.BASH UNITED STATES ATTORNEY

FAX (915) 534-6024

/S/ Jose Luis Gonzalez

JOSE LUIS GONZALEZ

Assistant U.S. Attorney

Texas State Bar No. 08129200

700 E. San Antonio, Ste. 200

El Paso, Texas 79901

(915) 534-6884